

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DORADO INVESTMENT COMPANY;  
MARSHALL D. MILLER, in his capacity as a  
General Partner of Dorado Investment Company;  
DAVID J. MILLER, in his capacity as a General  
Partner of Dorado Investment Company; STEVEN  
L. MILLER, in his capacity as a General Partner of  
Dorado Investment Company; and SUSAN  
MILLER, in her capacity as a General Partner of  
Dorado Investment Company,

Defendants.

Adv. Pro. No. 10-04333 (SMB)

**STIPULATION TO AMENDMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, et seq., and the substantively consolidated estate of Bernard L. Madoff on the one hand, and Dorado Investment

Company, Marshall D. Miller, David J. Miller, Steven L. Miler, and Susan Miller (collectively, “Defendants”) on the other hand, in each case by and through their respective attorneys, as follows:

1. On November 30, 2010, the above-captioned adversary proceeding was commenced by the Trustee against the Defendants.

2. On January 20, 2011, the Defendants timely served and filed their Answer to the Trustee’s Complaint in this matter.

3. Following the completion of certain portions of fact discovery, and pursuant to Federal Rule of Civil Procedure 15(a)(2) and Federal Rule of Bankruptcy Procedure 7015, Defendants have requested the Trustee’s consent to an amendment of Defendants’ Answer, which consent the Trustee has provided. This Stipulation confirms the Trustee’s consent in this regard.

4. Furthermore, and also pursuant to Federal Rule of Civil Procedure 15(a)(2) and Federal Rule of Bankruptcy Procedure 7015, the Trustee has requested Defendants’ consent to an amendment of the Trustee’s Complaint if the Trustee should determine that such amendment is necessary following the conduct of additional fact discovery, and Defendants have also provided that consent. This Stipulation confirms Defendants’ consent in this regard.

5. As a product of the parties’ stipulated consent to amendment, Defendants shall have until Friday, November 14, 2014 to serve and file their Amended Answer in this action.

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Dated: November 12, 2014

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Investment Securities LLC and Bernard L.  
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